## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

Big Village Holdings LLC, et al., 1

Case No. 23-10174 (CTG)

Debtors.

(Jointly Administered)

Hearing Date: March 8, 2023 at 3:00 p.m. (ET)
Objection Deadline: March 1, 2023 at 4:00 p.m. (ET)

Ref. Docket No. 13

## **NOTICE OF MOTION**

TO: (I) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) THE DEBTORS' THIRTY (30) LARGEST UNSECURED CREDITORS (EXCLUDING INSIDERS); (III) COUNSEL TO AGENT, MAYER BROWN LLP, ATTN: BRIAN TRUST, SCOTT ZEMSER, AND JOAQUIN C DE BACA AND POTTER ANDERSON & CORROON LLP, ATTN: L. KATHERINE GOOD; (IV) THE INTERNAL REVENUE SERVICE; (V) THE SECURITIES AND EXCHANGE COMMMISSON; (VI) THE OFFICE OF THE UNITED STATES ATTORNEY FOR THE DISTRICT OF DELAWARE; (VII) THE COUNTERPARTIES TO THE REJECTED LEASES; AND (VIII) ALL OTHER PARTIES THAT HAVE FILED A NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS IN THE CHAPTER 11 CASES AS OF THE DATE HEREOF

PLEASE TAKE NOTICE that, on February 8, 2023, the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed the Debtors' First Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Unexpired Leases of Nonresidential Property Effective as of the Petition Date [Docket No. 13] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").<sup>2</sup> You were previously served a copy of this Motion.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed at or before March 1, 2023 at 4:00 p.m. (ET) (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection or

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Big Village Holding LLC (6595); Big Village Group Holdings LLC (5882); Big Village Group, Inc. (6621); Big Village Insights, Inc. (8960); Big Village Media LLC (7288); EMX Digital, Inc. (5543); Big Village USA Corporation, Inc. (3414); Big Village Agency, LLC (0767); Balihoo, Inc. (9666); Deep Focus, Inc. (8234); and Trailer Park Holdings Inc. (1447). The Debtors' service address is 301 Carnegie Center, Suite 301, Princeton, NJ 80540.

<sup>30115465.1</sup> 

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall the meanings ascribed to such terms in the Motion.

response upon the undersigned proposed counsel to the Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER APPROVAL OF THE MOTION IS SCHEDULED FOR MARCH 8, 2023 AT 3:00 P.M. (ET) BEFORE THE HONORABLE CRAIG T. GOLDBLATT, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 10, 2023 Wilmington, Delaware

## YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Joseph M. Mulvihill

Michael R. Nestor (No. 3526) Matthew B. Lunn (No. 4119) Joseph M. Barry (No. 4221) Joseph M. Mulvihill (No. 6061) 1000 North King Street Rodney Square Wilmington, Delaware 19801

Tel.: (302) 571-6600 Facsimile: (302) 571-1253 Email: mnestor@ycst.com jbarry@ycst.com mlunn@ycst.com jmulvihill@ycst.com

Proposed Counsel for Debtors and Debtors in Possession